

## **Data protection statement of costrag GmbH (cargoscreen is a project by costrag GmbH)**

This data protection statement will explain how our organization uses the personal data we collect from you when you use our website [www.cargoscreen.com](http://www.cargoscreen.com). The processing of personal data of users of the website and other persons whose personal data we process, is subject to Swiss data protection law, in particular in accordance with the Federal Act on Data Protection (FADP) and – where applicable – foreign data protection law, such as the General Data Protection Regulation (GDPR) of the European Union (EU). The EU recognizes that Swiss data protection law ensures appropriate data protection.

### **1 Controller for the purposes of Article 27 GDPR**

The Controller for the purposes of the GDPR, other national data protection legislation or any other data protection law is:

costrag GmbH  
c/o Roth  
Gotthardstrasse 222  
6487 Goeschenen  
Switzerland  
[info@cargoscreen.com](mailto:info@cargoscreen.com)

Mr Sivan Goldberg  
[sivan@cargoscreen.com](mailto:sivan@cargoscreen.com)

### **2 General information concerning data processing**

#### **2.1 Collection and processing of personal data**

We collect personal data when you visit our websites or during normal course of communication and business with us.

Personal data is any information relating to an identified or identifiable person.

A data subject is a person whose personal data is processed.

Processing is any operation performed on personal data, independently of the tools and processes used, in particular storing, disclosing, collecting, deleting, saving, altering, destroying or using personal data.

We collect and process these data where they are necessary for and conducive to the fulfilment of administrative and business purposes, including in particular concerning your relationship to and business activities with us and in reference to the provision and further development of our software and services.

## 2.2 Legal basis

In transmitting your personal data, you thereby consent to the processing of the data transmitted to us by you in accordance with clause 2.1 above. Section 2 and 3 of the Swiss FADP as well as Section (b) of Article 6(1) GDPR are thus the primary legal basis for data collection and processing.

The storage of cookies and server log files and the use of Google Analytics (cf. also clause 3.2 below) is also based on section (f) of Article 6(1) GDPR: We have a legitimate interest in collecting and storing such data in order to enable us to display and present our website in an optimal manner. For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

## 2.3 Data erasure and storage

The personal data of the data subject will be erased or made unavailable once the purpose for which they were stored no longer applies.

Data may be stored or erased thereafter if so required under European or national legislation in EU regulations, laws or other provisions to which the Controller is subject. In such cases, data will be erased or made unavailable upon expiry of a maximum retention period prescribed under such provisions, unless it is necessary to continue to store the data and such continued storage is permitted.

## 3 Description and scope of data processing

### 3.1 Collection of personal data

We collect primarily the personal data that you expressly provide to us, depending upon your relationship with us. We collect personal data for the following purposes:

- a when our websites are accessed, in particular when users provide data on contact forms or registration pages, or when users subscribe to email newsletters. By accessing our website, you accept this data protection statement. Any user who does not accept the content of this data protection statement must refrain from accessing other pages of the website;
- b in the context of the registration for events and other activities organized and carried out by us for the marketing of our products and services with your explicit consent;
- c in the context of our strategic and operational corporate management and in communication with various contact persons, we use different instruments and tools, in particular:
  - i to ensure the operation, maintenance and further development of the software, including services (for example releasing, documentation, manuals, checklists, support, development tools, etc.);
  - ii to ensure the sale and marketing of our software and services (for example product/service information/promotions, white papers, newsletters, surveys, contractual agreements and financially relevant information);
  - iii to ensure the continued existence of the company on a sustainable and long-term basis (for example contractual agreements, financially relevant Information).

### 3.2 Data collection on our website

Our website uses cookies under certain circumstances; these are small text files that are downloaded to and stored on your computer, and which are used in order to render our content more user-friendly, more effective and more secure.

Session cookies are automatically erased at the end of your visit. This is the case for most types of cookies. Other cookies allow us the opportunity to recognize you again the next time you visit our website. These cookies are stored on your end device until they are removed by you.

In addition, we, or the provider of our website, also use Google Analytics and automatically collect and store information in so-called server log files. Google Analytics investigates in particular the origin of visitors to our websites, the duration of their visits to individual pages and the usage of search engines. Server log files are automatically transmitted by your browser to us and contain in particular information concerning the browser type and version, the operating system used, the referrer URL, the host name of the accessing computer, the time of the server request and the IP address.

Web-based data are not cross-referenced with any other data referring to you we may hold.

### 3.3 Processing of personal data

Your personal data are processed in accordance with clause 2.1 above with regard to your relationship with us and in accordance with

We process the personal data collected via the above-mentioned channels within the scope of applicable legislation and regulations for the following purposes:

- a the technical administration of the websites;
- b client and user administration and marketing;
- c informing you about our products and services;
- d all other purposes expressly specified during collection via the above-mentioned channels or requested by the data subjects.

Our employees and affiliates only have access to your data if and insofar as necessary in order to perform their duties. All employees have been subjected to an individual duty of confidentiality.

### 3.4 Disclosure of data to third parties

We only disclose personal data collected via the websites if:

- a you explicitly give your consent;
- b we have a legal obligation to do so;
- c such a disclosure is necessary for us to enforce our rights, in particular our claims from a contractual relationship.

Data are erased once they are no longer necessary in order to achieve the purpose for which they were collected or following a request pursuant to clause 4.3 of this data protection statement.

## **4 Rights of the data subject**

Since we process your personal data, you are a Data Subject for the purposes of the GDPR and have the following rights:

### **4.1 Right to information**

You can request confirmation as to whether any personal data relating to you are processed by us.

If such processing takes place, you can request information concerning:

- a the purpose for which the personal data are processed;
- b the categories of personal data concerned;
- c the recipients or categories of recipient to which your personal data have been or will be disclosed;
- d the envisaged period for which the personal data relating to you will be stored or, if specific information concerning this matter cannot be provided, the criteria used to determine that period;
- e the existence of a right to request the rectification or erasure of personal data concerning you, a right to obtain the restriction of processing or a right object to such processing;
- f the right to lodge a complaint with a supervisory authority;
- g any available information as to the source of data, where the personal data are not collected from you;
- h the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

You also have the right to request information as to whether personal data relating to you are transmitted to a third country or to an international organization. In this respect, you may request that you be informed of the appropriate safeguards pursuant to Article 46 GDPR in relation to the transmission.

### **4.2 Right to rectification**

You have the right to obtain rectification and/or completion in the event that the personal data processed in relation to you are inaccurate or incomplete.

### **4.3 Right to erasure**

You may request us to erase the personal data relating to you, and we are obliged in such an eventuality to erase the personal data concerning you without undue delay, where one of the following reasons applies:

- a the personal data relating to you are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

- b you withdraw your consent on which processing was based pursuant to section (a) of Article 6(1) or section (a) of Article 9(2) GDPR, and there is no other legal basis for processing;
- c you object to processing pursuant to Article 21(1) GDPR and there are no overriding legitimate grounds for processing, or you object to processing pursuant to Article 21(2) GDPR;
- d the personal data relating to you have been processed unlawfully;
- e the personal data relating to you have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f the personal data relating to you have been collected in relation to the offer of information society services referred to in Article 8(1) GDPR.

#### 4.4 Right to restriction of processing

Where the following prerequisites are met, you may obtain the restriction of processing of personal data relating to you:

- a if you contest the accuracy of the personal data relating to you, for a period enabling the controller to verify the accuracy of the personal data;
- b if the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- c if we no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims;
- d if you have objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the Controller override those of your own.

Where processing of personal data concerning you has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If processing has been restricted in accordance with the prerequisites set out above, you will be informed by us before the restriction of processing is lifted, as the case may be.

#### 4.5 Right to notification

If you have a right to rectification, erasure or restriction of processing in accordance with the above and if you have exercised this right against us, we are obliged to communicate the rectification, erasure or restriction of processing to each recipient to whom the personal data relating to you have been disclosed, unless this proves impossible or involves disproportionate effort.

You have the right to be informed by us about such recipients.

#### 4.6 Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on section (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions.

In such an eventuality, we will no longer process the personal data relating to you unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

#### 4.7 Right to withdraw the declaration of consent to data processing

If we have obtained a declaration of consent to data processing from you, you have the right to withdraw this at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### 4.8 Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes on the GDPR or other applicable data protection regulation.

### 5 **Data protection policies of other websites**

Our website contains links to other websites. Our data protection statement applies only to our website, so if you click on a link to another website, you should read their data protection or privacy policy.

### 6 **Changes to our data protection statement**

We reserve the right to amend this data protection statement at any time and therefore recommend that users of the websites read the data protection statement on a regular basis. We place any updates to this statement on this web page. This data protection statement was last updated on 6 October 2019.

### 7 **How to contact us**

Email us at: [info@cargoscreen.com](mailto:info@cargoscreen.com)

Or write us at:   
costrag GmbH  
c/o Roth  
Gotthardstrasse 222  
6487 Goeschenen  
Switzerland